Appl. No.:   09/524,140
Amdt. dated August 26, 2003
Reply to Office action of March 26, 2003

REMARKS/ARGUMENTS

In the Final Office Action dated March 26, 2003, the Examiner rejected claims 1-25 as obvious over Megiddo (U.S. Pat. No. 6,182,070). In this Response, Applicants amend claims 1-8 and 17 in conjunction with filing an RCE application. Based on the amendments and arguments contained herein, Applicants respectfully request reconsideration and allowance of all pending claims.

Applicants amend claim 1 to remove all reference to the labels "(a)," "(b)" and "(c)" to ensure that the order of the limitations listed in claim 1 does not imply that the claimed method is limited to that precise order. Applicants made corresponding amendments to dependent claims 6 and 7. Applicants amended claim 8 in a similar fashion. Further, Applicants removed references to "the step of" in various claims to ensure that such claims are not interpreted under the dictates of 35 U.S.C. § 112, sixth paragraph.

Regarding the art rejections, amended claim 1 specifies, among other limitations, that:

"said volume cube, association cube, population cube, base cube, and confidence cube comprise multi-dimensional data structures that have elements comprising one or more aggregated dimensions and that are processed in a multi-dimensional database."

This amendment provides additional context as to the claimed "cubes." As explained below, Megiddo does not teach or suggest the use of data cubes.

Megiddo teaches the use of "synthetic databases" that are "subsets of the original database." Col. 7, lines 12-15. The original database is described as "one or more databases 20 and/or flat files (i.e., text files 22), which contain data about one or more consumer transactions." Col. 6, lines 36-38. That the original database or the synthetic databases may contain data structures with multiple attributes (e.g., number of customers, number of transactions) does not indicate, imply, or even suggest that the original database, the synthetic databases, or the data structures contained therein are multi-dimensional. The claimed data cubes

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comprise multi-dimensional data structures that have elements comprising one or more aggregated dimensions and that are processed in a multi-dimensional database. Without limiting claim 1 beyond its clear language, a multi-dimensional database, unlike the original or synthetic databases of Megiddo, is generally a data repository that processes data cubes and that has an associated multi-dimensional environment usable for data cubes.

Dependent claims 2-7 depend from claim 1 and thus are patentable over the art of record at least for the same reason as claim 1.

Applicants amend claim 8 to specify that:

"said local customer profile cubes and global profile cubes comprise multi-dimensional data structures that have elements comprising one or more aggregated dimensions and that are processed in a multi-dimensional database."

Megiddo does not teach, imply, or even suggest the use of multi-dimensional data structure for use in a multi-dimensional database as claimed. At least for this reason, claim 8 is patentable over the art of record. Dependent claims 9-16 depend from claim 8 and thus are patentable over the art of record at least for the same reason as claim 8.

Applicants amend claim 17 to specify that:

"wherein said local profile cubes and global profile cubes comprise multi-dimensional data structures that have elements comprising one or more aggregated dimensions and that are processed in a multi-dimensional database."

As explained above, Megiddo does not teach, imply, or even suggest the use of multi-dimensional data structure stored a multi-dimensional database. At least for this reason, claim 17 is patentable over the art of record. Dependent claims 18-25 depend on or from claim 17 and thus are patentable over the art of record at least for the same reason as claim 17.
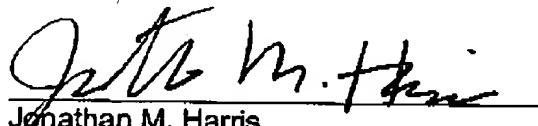
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In the course of the foregoing discussions, Applicants may have at times referred to claim limitations in shorthand fashion, or may have focused on a particular claim element. This discussion should not be interpreted to mean that the other limitations can be ignored or dismissed. The claims must be viewed as a whole, and each limitation of the claims must be considered when determining the patentability of the claims. Moreover, it should be understood that there may be other distinctions between the claims and the prior art which have yet to be raised, but which may be raised in the future.

If any fees or time extensions are inadvertently omitted or if any fees have been overpaid, please appropriately charge or credit those fees to Hewlett-Packard Company Deposit Account Number 08-2025 and enter any time extension(s) necessary to prevent this case from being abandoned.

Applicants respectfully request that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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